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University of Oregon and Hal Sadofsky

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland

JENNIFER JOY FREYD,

CV. 6:17-cv-448-MC

Plaintiff,

v.

UNIVERSITY OF OREGON, MICHAEL H.
SCHILL and HAL SADOFSKY,

Defendants.

**DECLARATION OF PAULA A.
BARRAN IN SUPPORT OF
DEFENDANTS UNIVERSITY OF
OREGON AND SADOFSKY'S
MOTION FOR SUMMARY
JUDGMENT**

I, Paula A. Barran, declare as follows:

1. I am one of the attorneys for defendants University of Oregon and Hal Sadofsky (collectively "defendants") in the above-captioned matter. I make this Declaration in Support of Defendants' Motion for Summary Judgment.

2. Pursuant to LR 7-1(a) the parties have conferred regarding this motion against plaintiff's claims. Specifically, on November 8, 2018 I spoke by telephone with Jennifer Middleton, Caitlin Mitchell, and Whitney Stark and discussed the issues that are raised in

defendants' motion. We have been unable to resolve the dispute over the issues raised in the motion.

3. Attached to this Declaration as Exhibit A is a true and correct copy of excerpts of the deposition of Ulrich Mayr taken on June 13, 2018.

4. Attached to this Declaration as Exhibit B is a true and correct copy of excerpts of the deposition of Jennifer Freyd taken on February 14, 2018.


5. Attached to this Declaration as Exhibit C is a true and correct copy of excerpts of the deposition of Hal Sadofsky taken on June 18, 2018.

6. Attached to this Declaration as Exhibit D is a true and correct copy of Plaintiff's Response to Defendant's First Set of Interrogatories to Plaintiff filed on September 18, 2017.

7. Attached to this Declaration as Exhibit E is a true and correct copy of Plaintiff's description of her job duties and responsibilities as defined by plaintiff in her response to Interrogatory No. 3 (FREYD 341-50, 319-331, and 633-41).

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 16th day of November, 2018.



Paula A. Barran

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November, 2018, I served the foregoing
**DECLARATION OF PAULA A. BARRAN IN SUPPORT OF DEFENDANTS
UNIVERSITY OF OREGON AND SADOFSKY'S MOTION FOR SUMMARY
JUDGMENT** on the following parties at the following addresses:


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by the following indicated method or methods set forth below:

- ☒ **Electronic Filing using the Court's ECF System**
- ☐ **First-class mail, postage prepaid**
- ☐ **Hand-delivery**
- ☐ **Overnight courier, delivery prepaid**
- ☐ **E-mail**



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